

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

MATTHEW REYNOLDS	:	
	:	
Plaintiff,	:	Civil Action No. 5:21-cv-01208-JFL
	:	
v.	:	
	:	
WILLERT MFG. CO., LLC	:	
	:	
Defendant.	:	

**DEFENDANT WILLERT MANUFACTURING COMPANY, LLC’S  
MOTION FOR SUMMARY JUDGMENT**

Defendant Willert Manufacturing Company, LLC (“Willert”), by and through its undersigned counsel, respectfully submits this Motion for Summary Judgment against Plaintiff, Matthew Reynolds (“Plaintiff”) pursuant to Federal Rule of Civil Procedure 56.

Willert incorporates by reference the Brief in support of this Motion, as well as the Statement of Undisputed Material Facts and accompanying exhibits being filed contemporaneously with this Motion.

WHEREFORE, Willert Manufacturing Company, LLC’s respectfully requests that this Court enter summary judgment in its favor and dismiss Plaintiff’s claims against it, in their entirety, with prejudice.

Respectfully submitted this 7th day of September 2021.

**KAUFMAN DOLOWICH & VOLUCK, LLP**

By: /s/Eileen Monaghan Ficaro  
Gregory S. Hyman, Esquire  
Eileen Monaghan Ficaro, Esquire  
Four Penn Center  
1600 John F. Kennedy Blvd., Suite 1030  
Philadelphia, PA 19103  
(215) 501-7024 (phone)  
(215) 405-2973 (fax)  
ghyman@kdvlaw.com  
eficaro@kdvlaw.com  
*Attorneys for Defendant*  
*Willert Manufacturing Company, LLC*